

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

DAVID I. GLOVER and TIMOTHY B.
PRIDEMORE,

Plaintiffs,

v.

THE CITY OF NORFOLK, VIRGINIA, and
RICHARD J. HRYNIEWICH,

Defendants and Third-Party Plaintiffs

v.

SAFE BOATS INTERNATIONAL, LLC
AND WILLARD MARINE, INC.

Third-Party Defendants and
Counterclaimant,

Case No. 2:17-cv-00109 (EWH)

Case No. 2:17-cv-00110 (EWH)

MOTION FOR SECOND EXTENSION OF TIME TO FILE DISMISSAL ORDERS

NOW COME Defendants and Third-Party Plaintiffs, the City of Norfolk, Virginia and Richard J. Hryniwicz (hereinafter, “Defendants”), by counsel, and move this Court for an entry of an order extending the deadline for all of the parties to file their particular dismissal orders concerning all claims currently pending before this Court (Civil Action Numbers: 2:17-cv-00109 and 2:17-cv-00110) to July 5, 2023, pursuant to this Court’s Order Granting Extension of Time to File Dismissal Order (ECF No. 300).

Following this Court’s Order granting the Defendants’ Motion to Extend (ECF No. 300), the parties have continued negotiations to finalize the terms and conditions of the Settlement reached by the parties. Unfortunately, some terms and conditions remain unresolved. The parties remain committed to working to finalize the terms and conditions of the Settlement reached by the

parties. However, given that there are eight participants involved in the negotiation of the terms and conditions of the Settlement, the parties require another brief extension. The parties intend to continue to negotiate the few remaining issues over the holiday weekend. If a resolution is not achieved, a Motion to Enforce the Settlement will be filed next week, on or before July 7, 2023. The parties respectfully request an extension to July 7, 2023.

Defendants certify to this Court that this request for an extension is not being made for an improper purpose or to cause undue delay. Defendants certify that counsel for Plaintiffs David I. Glover and Timothy B. Pridemore, Third Party Defendant Safe Boats International, LLC, and Third-Party Defendant and Counterclaimant Willard Marine, Inc. have advised that they join in this Motion.

Dated: June 30, 2023

RICHARD J. HRYNIEWICH and THE CITY
OF NORFOLK, VIRGINIA

By /s/ Heather R. Pearson
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*Counsel for the City of Norfolk and
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of June 2023, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following, and serve a copy of the same by U.S. mail and electronic mail:

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